

**LOCAL BANKRUPTCY FORM 9013-4****IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA****IN RE:****Jefferey Lynn Beecroft, Jr.****Debtor****CHAPTER 7****CASE NO. 5:24-bk-01804****Andrew R. Vara,  
U.S. Trustee****Movant****NATURE OF PROCEEDING: Motion to Dismiss for Abuse****DOCUMENT No. 17****vs.****Jefferey Lynn Beecroft, Jr.****Respondent****REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party. This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Debtor intends to file a Motion to Convert Case to a proceeding under Chapter 13.  
Parties request continuance to January 16, 2025, to allow for Motion to Convert to be filed and heard.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: November 4, 2024

/s/ Joseph P. Schalk, Esquire

Applicant's Signature

<sup>1</sup> No alterations or interlineations of this document are permitted.

<sup>2</sup> If this is not a first request for a continuance, then a Motion to Continue must be filed.